

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| -----X | | |
| E2W, LLC, A DELAWARE LIMITED LIABILITY COMPANY, | : | |
| | : | |
| Plaintiff, | : | 1:20-cv-02866-JPC |
| | : | |
| -against- | : | |
| KIDZANIA OPERATIONS, S.A.R.L., a Luxembourg corporation, | : | JOINT STIPULATION OF DISMISSAL WITH PREJUDICE |
| | : | |
| Defendant | : | |
| -----X | | |

The parties to this action, KidZania Operations, S.A.R.L. ("KidZania") and E2W, LLC ("E2W") (jointly referenced as the "Parties"), acting through counsel, and pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), hereby stipulate, in consideration of a negotiated settlement executed by them (the "Settlement Agreement"), to the Dismissal With Prejudice of this action, including all claims, causes of actions, and counterclaims stated herein against all parties, with each party to bear its own attorney's fees and costs.

The Settlement Agreement contains future performance obligations, including a payment schedule and obligations to open franchisee facilities by dates certain and provides that, in the event of a default, a stipulated judgment will be entered in this Court. While this action is being dismissed with prejudice, the parties have agreed that, in the event of an uncured default by E2W of its obligations under the Settlement Agreement or the Franchise Agreement, a new action will be filed in this Court by KidZania and related to this Case, and that KidZania may proceed to seek entry of the Stipulated Judgment by way of ex parte application.

DATED: September 17, 2021

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DATED: September 17, 2021

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A handwritten signature in black ink, appearing to read 'Chris Caldwell', with a long horizontal flourish extending to the right.

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9-20-21

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